European Union Aviation Safety Agency

FAQ n.19146

FAQs:

ORO.GEN, Part-ORO, Air Operations, Regulations

Question:

Why do the EASA Air Operations rules use the term ‘management system’ (ORO.GEN.200) and not ‘safety management system’ (SMS), like in ICAO Annex 19? Is there a difference between the two concepts?

Answer:

Reference: Regulation (EU) No 965/2012 on Air Operations, Annex III (Part-ORO)

In the area of SMS the Agency promotes consolidated general requirements for an organisation’s management system. The starting point for drafting the ‘first extension’ rules are the essential requirements attached in the annexes to the Basic Regulation (Regulation (EU) 2018/1139) and these refer to ‘management system’, cf. the essential requirements for air operations (Annex V, point 8.1 (c)):

> “(…) the aircraft operator must implement and maintain a management system to ensure compliance with the essential requirements set out in this Annex, manage safety risks and aim for continuous improvement of this system;” (…)

The underlying concept is that for managing safety it is essential to take a holistic approach and to implement the new safety risk management (SRM) related processes while making use of and integrating these into the already existing management system (e.g. quality system as per JAR-OPS/ EU-OPS). For example, the internal audit process (compliance monitoring) is kept as an essential element of the management system, while ICAO Annex 19 is not that clear about it.

Hence, organisations should be encouraged to integrate the new SRM elements into their existing system and articulate these with the way the organisation is managed, addressing every facet of management, as any organisational change and any decision (even in areas such as Finance, Human Resources) will need to be assessed for their impact on safety. Such integrated approach to management is much more efficient for monitoring compliance, managing risks and maximising opportunities.

Finally, it is not required that organisations adapt their terminology to that used in Part-ORO:

Should they wish to refer to SMS, QMS or SQMS etc., this is possible as long as they can demonstrate that all requirements are met. In the same vein, they can still use the title ‘quality manager’, although the rules refer to compliance monitoring manager.

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